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Attorney for Defendant, ELIJAH WASHINGTON, JR.

UNITED STATES OF AMERICA	::	UNITED STATES DISTRICT COURT
	::	DISTRICT OF NEW JERSEY
Plaintiff,	::	
	::	
vs.	::	CRIMINAL NO. 12 CR 253 (JLL)
ELIJAH WASHINGTON, JR.,	::	
Defendant,	::	<u>COMPLEX CASE ORDER</u>
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**THIS MATTER** having been opened to the Court on the joint application of the United States of America and defendant (through counsel), for an order declaring this matter to be a complex case pursuant to 18 U.S.C.A. § 3161(h)(7)(B)(ii); and the Court having considered the arguments of counsel; and the defendants being aware that absent such finding they would have a right to be tried within seventy days of their first appearance in this district in connection with this matter, pursuant to 18 U.S.C.A. § 3161(c)(1); and the charges being the result of a lengthy investigation and the defendants needing sufficient time to review extensive discovery and to investigate the charges and file motions in this case; and Paul J. Fishman, United States Attorney for the District of New Jersey (Alex Kriegsman, Assistant United States Attorney, appearing) having concurred in the assertion that this matter is complex as defined in the statute; and the Court having found that an order granting a continuance of the proceedings in the above-captioned

matter should be entered, and for good and sufficient cause shown,

**IT IS THE FINDING OF THIS COURT** that this action should be continued for the following reasons:

1. This case involves allegations of tax evasion and aiding and assisting in the preparation of false tax returns that occurred over several years.
2. The discovery in this case is voluminous, in that it consists of, among other things, thousands of pages of tax and financial documents.
3. The defendant and his counsel need time to review the extensive discovery in this matter.
4. In light of the allegations, the defendant needs sufficient time to investigate the charges.
5. In light of the discovery and depending on the result of defendant's investigation, the defendant will need time to determine whether or not motions would be necessary.
6. In light of these findings, and given the nature of the case and its complexity, it is unreasonable to expect adequate preparation for the pretrial proceedings or the trial itself within the time limits established under the Speedy Trial Act.
7. The consent of both parties to the aforementioned continuance.
8. The grant of a continuance will enable counsel for the defendants to adequately review the discovery, prepare motions and proceed with trial.
9. Pursuant to 18 U.S.C.A. § 3161(h)(7), the ends of justice served by granting the continuance outweigh the best interests of the

public and the defendants in a speedy trial.

WHEREFORE, it is on this 29<sup>th</sup> day of May, 2012

ORDERED that this matter is hereby designated a complex case;

IT IS FURTHER ORDERED THAT the proceedings in the above-captioned matter are continued until September 25, 2012, and that the period of time from June 25, 2012 through September 25, 2012 shall be excluded for the purposes of computing time under the Speedy Trial Act;

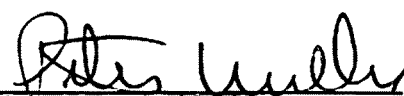
IT IS FURTHER ORDERED THAT:

1. Motions are due by August 21, 2012 and oppositions are due by September 4, 2012.
2. The return date for pretrial motions shall be September 10, 2012.
3. The trial shall commence on September 18, 2012.

  
Hon. Jose L. Linares  
United States District Judge

Form and entry  
consented to:

  
Alex Kriegsman  
Assistant U.S. Attorney

  
Peter R. Willis, Esq.  
Counsel for Defendant